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December 21, 2020

Hon. Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Jagdev and Kuldeep Singh v. Singh et al
19 CV 6927

Dear Judge Cogan:

I am writing as the attorney for the plaintiffs in the above entitled action with the consent of opposing counsel.

This office has obtained the consent of the plaintiffs to stipulate to voluntarily discontinue the pending action as against all of the defendants. A copy is attached executed by counsel to the parties who have appeared.

As to the defaulting defendants, MANDEEP KAUR, MANMOHAN SINGH and TALICO CONTRACTING INC, the alleged employers, the dismissal would be without prejudice.

As to the defendants NEELAM CONSTRUCTION CORPORATION and WESTERN SURETY COMPANY the dismissal would be with prejudice.

As to the pending Order to Show Cause, the plaintiffs respectfully request that the Court deem the issues raised moot as a result of the voluntary dismissal.

After substantial communications with my clients, which took place over several weeks, plaintiffs were made aware of the issues raised concerning their document production and their prior testimony and how that effected pursuing the claims they made in the complaint.

As plaintiffs have claims concerning checks from defendants MANDEEP KAUR, MANMOHAN SINGH and TALICO CONTRACTING INC, received but dishonored and/or from an account without funds to honor those checks, the discontinuance was without prejudice to their pursuing those claims.

It is respectfully requested that the Court accept this explanation as a response to the pending Order to Show Cause and to obtain the Court's approval for the stipulation of voluntary discontinuance filed in this case.

Respectfully submitted,


JONATHAN SILVER

JS/eb